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December 10, 2019

**VIA ELECTRONIC FILING**

Hon. Vernon S. Broderick  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Recovery Effort Inc. v. Zeichner Ellman & Krause LLP, et al.*,  
No. 19-cv-05641 (VSB)

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Dear Judge Broderick:

We represent Defendants Zeichner Ellman & Krause LLP ("ZEK") and Yoav M. Griver (together, the "ZEK Defendants") in the above-captioned action. With the consent of all parties, we write to request a second extension of time, until January 15, 2020, for all Defendants to answer, move, or otherwise respond to the Complaint.

By stipulation dated September 11, 2019 (ECF 12), all Defendants acknowledged service by email of the summons and Complaint. The stipulation fixed November 15, 2019, as the date by which all Defendants would respond to the Complaint.

Subsequently, by order of November 13, 2019 the Court extended that deadline for all Defendants to December 16, 2019 (ECF 18).

Counsel continue to gather information and coordinate in preparation of their respective responses. While all have proceeded diligently, additional time is required to respond to the Complaint. To this end, we note that the litigation involving the Plaintiff's assignor from which Plaintiff's claims ostensibly arise was extensive, long-lived, and involved multiple jurisdictions.

Accordingly, Defendants respectfully ask that the Court extend the time for all Defendants to answer, move to dismiss, or otherwise respond to the Complaint from **December 16, 2019 to January 15, 2020**. One earlier request to extend this deadline has been made (ECF 17) and granted by the Court (ECF 18).

Very truly yours,

/s/ Anna Lea Setz  
Sullivan & Worcester LLP  
Counsel for Zeichner Ellman & Krause LLP  
and Yoav M. Griver

cc: Counsel of Record (via email)